

From: Mark R. Soble  
Chief Administrative Law Judge

To: Agricultural Labor Relations Board

Date: October 6, 2021

RE: September 22, 2021 Regulatory Proposals

Here are my comments that address two of the proposed regulations that would impact the Administrative Law Judge Unit.

**1. Regulation § 20247.1, subdivision (b), Case Management Conference**

I think that this is an excellent proposed regulation. In particular, this regulation adds value when I look at succession planning. Right now, we have three very experienced administrative law judges (ALJs), so I am comfortable with delegating a fair amount of discretion. But in the future, as the agency expands or replenishes its ALJ staff, the regulation structure will serve the agency well, as new and less-experienced judges potentially join us.

**2. Regulation § 20248, Settlement Conference**

I think that this is an excellent proposed regulation. The regulation requires the initial timely scheduling of a settlement conference. It does not appear to limit the settlement ALJ's authority to thereafter deviate from the scheduled date when circumstances warrant it.